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This memorandum is my response to the Food Distribution 2000 document dated February 14, 2000. My interest is centered on what is best for my small school district for which I am the food service director. I have read the C.O.R.E. report, the most frequently asked questions and answers on the USDA website, and am familiar with the Commodity Improvement Council's and the Senior Oversight Committee's roles in this process.

While there are a few parts of this proposal such as long term contracting which would be very beneficial to the commodity program, many proposed changes seem to be focused on concerns expressed by larger states and cities in this country ignoring the impact of these changes on smaller states, cities, and rural areas. The Commonwealth of Kentucky has refined the USDA commodity program and procedures over many years. Wholesale "change for change sake" is not acceptable and I feel there are implications of this attitude reflected in many of the proposed changes and in such terminology as "reinventing the system." The system used in Kentucky does not need to be reinvented; it just needs to be refined. Larger states, such as Colorado and California, can benefit from the structure of and the oversight provided by the commodity operation in the Commonwealth of Kentucky.

A major concern of these proposed changes is the impact on the financial operations of small school districts. Most small districts operate school food service programs that are already stretched for dollars. To implement many of the changes proposed would require additional staffing and additional equipment expenditures to process the added paperwork. I shudder to consider the full implication of what computer connectivity will require of my district in terms of added expenditure!

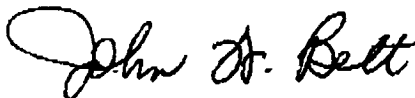
Many questions are left unanswered after reading the available information. I would like to see a response to the following questions:

- Why are the processes already in place not being considered?
- How will PAL's be established? Who is going to do it?

- Why is there a need for computer connectivity between the school district and USDA? Is the Commonwealth of Kentucky out-of-the-loop if this occurs? What kinds of contingency plans would be in effect to handle equipment failures and on-line problems that will occur?
- How will dual labeled products be accounted for when appropriated by relief agencies such as the Red Cross?
- How will the seamless ordering process work?
- What and how does State entitlement work under this proposal?

In summary, my feeling is that C.O.R.E. as implemented in the Food Distribution 2000 document will be of most benefit to large, metropolitan districts and large processors. Because of the aforementioned reasons and others not stated, small, rural school districts such as mine will suffer financial hardship if these changes are adopted.

Submitted this date by:



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